

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

PAUL PHILLIPS, KHAORI WRIGHT, RANDY  
ROSARIO, AND KYLASYIA THOMPSON, *on behalf  
of themselves and all others similarly situated,*

21-cv-8149 (ALC) (SLC)

Plaintiffs,

v.

THE CITY OF NEW YORK et al.,

Defendants.

**PLAINTIFFS' RULE 4(d) DISCOVERY**

Pursuant to Rules 26, 33, 34, and 36 of the Federal Rules of Civil Procedure (“Federal Rules”) and Local Rules 26.2 and 26.3 of this Court (“Local Rule” or “Local Rules”), Plaintiffs hereby requests The City of New York, and any defendant who is currently or subsequently named and hereafter represented by the Office of the Corporation Counsel in this action, serve upon the undersigned sworn written answers to each of the interrogatories set forth below and produce for inspection and copying the documents requested below to the attention of Remy Green, Cohen&Green P.L.L.C., 1639 Centre St., Suite 216, Ridgewood, NY 11385, by email to [Remy@femmelaw.com](mailto:Remy@femmelaw.com) and [Protests@femmelaw.com](mailto:Protests@femmelaw.com), on or before April 5, 2024 days after service hereof.

**INSTRUCTIONS AND DEFINITIONS**

1. These requests incorporate the instructions and definitions used in prior document requests and requests for admission.
2. If Defendants admit request for admission 1, they need not answer document request 1, if they admit request for admission 2, they need not answer document request 2, and so on.

**REQUESTS FOR ADMISSION**

1. Defendant Renan Beauchard uses the email address [rbeauchard96@gmail.com](mailto:rbeauchard96@gmail.com).
2. Defendant Renan Beauchard owns and lives at the property at 53 West Clarkstown Rd., Clarkstown, NY 10956.

**DOCUMENT REQUESTS**

1. Produce one copy of an email or email thread for every email address Mr. Beauchard has sent an email to counsel, with the substantive contents of such email or email thread redacted.
2. Produce travel records, property records, and or communications sufficient to show (1) whether Mr. Beauchard ever lives or stays at the property at 53 West Clarkstown Rd., Clarkstown, NY 10956; and (2) if he does not, who does live and stay there, given that Mr. Beauchard is the owner of that property (*see* ECF No. 168).

Dated: Ridgewood (Queens), NY  
April 2, 2024

**COHEN&GREEN P.L.L.C.**

/s/

**BY:** J. Remy Green

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